



the deadline to file Judd's response. The new deadline under the proposed extension would be Thursday, September 8, 2022.

3. Judd filed this Motion as soon as it became aware of the need for additional time and before the deadline of August 25, 2022.

## II.

4. A court may grant a request to extend time for good cause. Fed. R. Civ. P. 6(b)(1)(A); *Rachel v. Troutt*, 820 F.3d 390, 394–95 (10th Cir. 2016). Here, Judd asks the Court to extend the deadline to respond to Tina Kim's Motion to Dismiss by two weeks until September 8, 2022, as lead counsel is out of the office. Judd's request is for good cause and is not intended to delay these proceedings. Tina Kim is in agreement with the proposed extension and will not be prejudiced.

For the foregoing reasons, Plaintiff JUDD FOUNDATION respectfully prays the Court extend its deadline to respond to Defendant TINA KIM, LLC'S Motion to Dismiss to September 8, 2022, and award any further relief to which it may be justly entitled, at law or in equity.

### CERTIFICATE OF CONFERENCE

I certify that on August 17, 2022, I conferred with Richard Lerner, Esq. and he does not oppose the Motion.

  
CHRISTOPHER ROBINSON

Respectfully submitted,

KEMP SMITH LLP  
221 North Kansas, Suite 1700  
El Paso, Texas 79901-1441  
(915) 533-4424  
(915) 546-5360 (FAX)

By: /s/ Ken Slavin  
Ken Slavin  
State Bar No. 18496100  
Attorneys for Plaintiff  
**Judd Foundation**

### **CERTIFICATE OF SERVICE**

Undersigned hereby certifies that a true and correct copy of the foregoing document has been filed via the court's ECF system and sent via e-mail to all counsel of record, this 19th day of August, 2022.

/s/ Ken Slavin  
KEN SLAVIN